



Subscriber Notification Report

WC Docket No. 05-196

GlobalPhone Corporation Overview

GlobalPhone is a facilities-based carrier headquartered in Falls Church, Virginia, a suburb of Washington, DC. GlobalPhone provides services to 600,000 customers in over 130 countries, and maintains a network of over 300 business partners around the world. GlobalPhone is a privately held, debt-free corporation.

GlobalPhone has enjoyed steady, rapid growth since it's founding in 1995, and has received several prestigious awards, including the Washington Technology Fast 50 Award and the Independent Agent Network Circle of Excellence Award.

GlobalPhone is licensed by the Federal Communication Commission (FCC) as a 214 carrier and has filed tariffs in accordance with the FCC regulations. GlobalPhone owns and operates its own TDM and IP-based voice network, and maintains business relationships with many of the world's largest carriers such as Global Crossing, Teleglobe, Level(3), MCI, Qwest, Verizon, US LEC, Primus, and TDC.

GlobalPhone is dedicated to providing high-quality, innovative services to the international telecommunications market. We build enduring relationships with our partners and customers by providing a creative approach to enabling technology, and by offering outstanding customer service at competitive rates.

GlobalPhone introduced GlobalTone service, an IP Centrex VoIP business offering, in October 2004. We currently have over 200 GlobalTone users.

Any questions, please contact Matt O'Brien.

Respectfully,

Matt O'Brien
GlobalTone Customer Service Manager
703-584-4359

mobrien@gphone.com

• **A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);**

On 7/20, GlobalPhone sent via email to all VoIP customers (as of 7/19) a detailed letter advising them of 911 availability and/or lack of 911 availability at all of their locations.

This following is a copy of the 7/20 email:

Dear GlobalTone User:

The FCC has mandated all VoIP providers to advise all their subscribers with the current 911 availability information associated with their VoIP service. GlobalPhone must obtain and retain your acknowledgment of receiving and understanding this information. Pages 1 and 2 of the attachment describes the 911 services, page 3 is the Acknowledgment page which must be signed, faxed and the original mailed back to GlobalPhone no later than July 28, 2005.

Fax number: 703-531-6003

Mailing address: GlobalPhone Corporation
ATTN: Matt O'Brien
137 N. Washington St.
Suite 200
Falls Church, VA 22046

GlobalPhone will be providing the required warning stickers upon receipt of your acknowledgment form. Thank you in advance for cooperating and returning your acknowledgment. If you have any questions, please do not hesitate to call me.

Sincerely,

Matt O'Brien
GlobalTone Sales Support Manager
703-584-4359

The following is the Acknowledgement Letter sent to customers with 911 service (this was attached to the above email):

July 19, 2005

ACKNOWLEDGEMENTS REGARDING GLOBALTONE AND 911-TYPE SERVICES

INTRODUCTION

Pursuant to the Federal Communications Commission's VoIP E911 Order (WC Docket Nos. 04-36 and 05-196, FCC 05-116, released June 3, 2005), ¶¶ 48-49, and Section 9.5(e) of the FCC's rules, all interconnected VoIP providers are required to "advise every user, both new and existing, prominently and in plain language, the circumstances under which E911 Service may not be available through the interconnected VoIP service or may be in some way limited by comparison to traditional E911 service."

Because GlobalPhone Corp. is providing GlobalTone service to you, we are obligated to make certain disclosures to you regarding our 911 services, and to obtain and retain your acknowledgment of having received and understood these disclosures. We request that, you sign and return to us the acknowledgement at the end of this letter to acknowledge that you understand the limits of the 911 capabilities of the GlobalTone service, and to acknowledge that you will comply with your obligation to inform your users of these limitations no later than July 28, 2005.

"911-type Services" means functionality that allows end users to contact emergency services, including, without limitation, police, and fire and hospital medical services. 911-type Services may include Enhanced 911-type Service ("E911"), which has the ability to selectively route an emergency call to the primary 911 provider so that it reaches the correct emergency service located closest to the user location and to transmit the identification of the user location and telephone number (subject to the obligations to provide and maintain the user location information). Enhanced 911-type Service is not immediately available in all areas, and is subject to the capabilities of the local PSAP.

DIRECT INWARD DIALING NUMBERS (DIDS)

The DIDs assigned to your group supports 911-type Services utilizing the 911 infrastructure to complete calls to an emergency service dispatcher. You acknowledge and understand that 911-type dialing is NOT automatic, that you and your users must separately take affirmative steps to effectuate such 911-type Services and that such 911-type Services is different in a number of important ways from traditional 911 service as set forth below.

You acknowledge and understand that subject to the limitations set forth below, every user must provide a user location (in the form of a valid street address) and you and your users are responsible for correctly and timely inputting, validating, maintaining and updating such user location information in the manner prescribed by GlobalPhone.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of the assignment of a telephone number to a user location outside of the geographic rate center associated with such telephone number; or the relocation of the calling device to which a telephone number has been assigned to a location away from the registered user location associated with such telephone number; or you or your user fail to or are delayed in maintaining and updating user location information as required to enable that information to be registered in the local telephone company's Automatic Location Information database.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of an outage, degradation or other disruption of electric power at the user location.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of an outage, degradation or other disruption of the user broadband Internet connection.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of a suspension of your account as a result of nonpayment or other breaches by you.

NEXT STEPS

You and your users should notify any user of the GlobalTone service who may place calls, of these 911 limitations. We have provided you with a set of stickers detailing each phone's 911 capabilities.

Please evidence your acknowledgement by signing where indicated on the next page and returning this notice via facsimile to 703-531-6003 and then forwarding the original copy to GlobalPhone Corporation, Attention: Matt O'Brien, 137 North Washington St., Suite 200, Falls Church VA 22046.

GlobalPhone appreciates in advance your support and compliance and we look forward to continue to provide you with superior VoIP services. Please be advised, in the event that GlobalPhone does not receive timely acknowledgement, GlobalPhone may be required by the FCC to terminate or suspend the applicable your GlobalTone service. If you have any questions, please contact me at 703-584-4359.

Yours truly,

Matt O'Brien
GlobalTone Sales Support Manager
GlobalPhone Corporation

The following is the letter sent to customers without 911 service (this was attached to the above email):

July 19, 2005

ACKNOWLEDGEMENTS REGARDING GLOBALTONE AND 911-TYPE SERVICES

INTRODUCTION

Pursuant to the Federal Communications Commission's VoIP E911 Order (WC Docket Nos. 04-36 and 05-196, FCC 05-116, released June 3, 2005), ¶¶ 48-49, and Section 9.5(e) of the FCC's rules, all interconnected VoIP providers are required to "advise every user, both new and existing, prominently and in plain language, the circumstances under which E911 Service may not be available through the interconnected VoIP service or may be in some way limited by comparison to traditional E911 service."

Because GlobalPhone Corp. is providing GlobalTone service to you, we are obligated to make certain disclosures to you regarding our 911 services, and to obtain and retain your acknowledgment of having received and understood these disclosures. We request that, you sign and return to us the acknowledgement at the end of this letter to acknowledge that you understand the limits of the 911 capabilities of the GlobalTone service, and to acknowledge that you will comply with your obligation to inform your users of these limitations no later than July 28, 2005.

“911-type Services” means functionality that allows end users to contact emergency services, including, without limitation, police, and fire and hospital medical services. 911-type Services may include Enhanced 911-type Service (“E911”), which has the ability to selectively route an emergency call to the primary 911 provider so that it reaches the correct emergency service located closest to the user location and to transmit the identification of the user location and telephone number (subject to the obligations to provide and maintain the user location information). Enhanced 911-type Service is not immediately available in all areas, and is subject to the capabilities of the local PSAP.

DIRECT INWARD DIALING NUMBERS (DIDS)

At this time, your DIDs do not support 911-type Services. You acknowledge and understand that: a call placed to 911 will attempt to complete, but it will not utilize the 911 infrastructure to selectively route calls to the primary 911 provider; the 911 call may or may not complete and if it does complete, it may complete to a 911 dispatcher or to a general or administrative line; and such administrator may or may not be specifically designated to receive the incoming 911 call and there may be a greater possibility that the general or administration line may produce a busy signal or will take longer to answer or not be answered at all; the 911 call may be completed to a 911 dispatcher (or to a general or administrative line) in a different geographic location than the caller’s location; the caller’s location information will not be displayed; and the callback number may or may not be displayed. The caller needs to communicate their location and phone number to the individual answering the call.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of the assignment of a telephone number to a user location outside of the geographic rate center associated with such telephone number; or the relocation of the calling device to which a telephone number has been assigned to a location away from the registered user location associated with such telephone number; or you or your user fail to or are delayed in maintaining and updating user location information as required to enable that information to be registered in the local telephone company’s Automatic Location Information database.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of an outage, degradation or other disruption of electric power at the user location.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of an outage, degradation or other disruption of the user broadband Internet connection.

You acknowledge and understand that 911-type Services will not be available to a particular user in the event of a suspension of your account as a result of nonpayment or other breaches by you.

You acknowledge and understand all of the limitations and obligations set forth above shall apply in the event such 911 calls are attempted.

Our underlying carrier has advised GlobalPhone, that 911-type Services will be established for your DIDs by the end of 2005. At this time, we do not have a firm date, but will advise you when one is announced. We highly recommend the installation of a standard telephone lines from your Local Exchange Carrier to be used for 911 calls.

If you are using a DSL access line, you may have a standard telephone line associated with the DSL service.

NEXT STEPS

You and your users should notify any user of the GlobalTone who may place calls, of these 911 limitations.

Please evidence your acknowledgement by signing where indicated on the next page and returning this notice via facsimile to 703-531-6003 and then forwarding the original copy to GlobalPhone Corp., Attention: Matt O'Brien, 137 North Washington St., Suite 200, Falls Church VA 22046.

GlobalPhone appreciates in advance your support and compliance and we look forward to continue to provide you with superior VoIP services. Please be advised, in the event that GlobalPhone does not receive timely acknowledgement, GlobalPhone may be required by the FCC to terminate or suspend the applicable your GlobalTone service. If you have any questions, please contact me at 703-584-4359.

Yours truly,

Matt O'Brien
GlobalTone Sales Support Manager
GlobalPhone Corporation

On 7/25, GlobalPhone sent the following email to all VoIP customers reminding them of the upcoming 7/28 deadline.

Dear GlobalTone User:

This is a reminder that GlobalPhone must received your signed 911 Acknowledgment letter by COB Thursday July 28 as mandated by the FCC. Please sign the letter and fax it to 703-531-6003. We also require the signed, original letter mailed to the following address:

GlobalPhone Corporation
ATTN: Matt O'Brien
137 N. Washington Street
Suite 200
Falls Church, VA 22046

This letter was attached to an email sent to you on Wednesday 7/20. If you did not receive this email or the attachment, please let me know and I will resend the email and attachment.

If you have already faxed the signed letter, please accept out thanks.

Sincerely,

Matt O'Brien
GlobalTone Sales Support Manager
703-584-4359

• A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005;

As of 8/9: 33.3% of GlobalPhone's VoIP customers have submitted their signed Acknowledgement Letter. We estimate that by 8/29, all of our customer's will have submitted the Acknowledgement Letter.

**• A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service.
4 VoIP E911 Order at ¶¶ 48, 73; see also 47 C.F.R. §9.5(e)..3
This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);**

GlobalPhone created 2 sets of warning stickers. The first set stated that 911 service is available, the second set that 911 service is not available. As GlobalPhone's VoIP customers returned the Acknowledgement letter, the appropriate sets of stickers were sent via US Mail. On 8/8 and 8/9, we sent out the stickers with a reminder of the upcoming 8/29 deadline to all those who have not submitted the Acknowledgement Letter.

• A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above;

0% of customers were not sent the Acknowledgement Advisory and Letter;
0% of customers were not sent warning stickers.

• A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;

- 1) Weekly email reminders that GlobalPhone has not received the customer's Acknowledgment letter.
- 2) Commencing the week of 8/22, we will conduct a phone campaign contacting all customers' that have not signed and returned the Acknowledgment Letter.
- 3) Disconnecting service on 8/30 for those customers who have not returned the Letter.

• A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers; and

GlobalPhone files the original Acknowledgment Letter in the customer's folder maintained in the Controller's office. Additionally, we file paper copies of the Letter and electronic copies in the customer's folder maintained by Customer Service.

• The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the *VoIP E911 Order*.

Matthew O'Brien, Customer Service Manager, 703-584-4359
David Hartig, Controller, 703-584-5702

137 N. Washington Street
Suite 200
Falls Church, VA 22046